

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

KPM ANALYTICS NORTH AMERICA  
CORPORATION,

*Plaintiff.*

v.

BLUE SUN SCIENTIFIC, LLC, THE  
INNOVATIVE TECHNOLOGIES GROUP &  
CO., LTD., ARNOLD EILERT, MICHELLE  
GAJEWSKI, ROBERT GAJEWSKI,  
RACHAEL GLENISTER, GREGORY  
ISRAELSON, IRVIN LUCAS, AND PHILIP  
OSSOWSKI,

*Defendants.*

Civil Action No. 21-10572-MRG

**PLAINTIFF KPM ANALYTICS NORTH AMERICA CORPORATION’S MOTION IN  
LIMINE TO EXCLUDE EXHIBITS THAT WERE NOT PRODUCED IN DISCOVERY**

Plaintiff KPM Analytics North America Corporation (“KPM”) respectfully requests this Court for an Order granting its Motion *in Limine* to Exclude Exhibits that were not Produced in Discovery (the “Motion”). In support of this Motion, KPM relies on the concurrently filed Memorandum in Support of its Motion *in Limine* to Exclude Exhibits that were not Produced in Discovery, and such further arguments and evidence as may be properly presented to the Court at the time of hearing on the Motion.

WHEREFORE, KPM respectfully requests that the Court allow the Motion.

**Date:** April 26, 2023

Respectfully submitted,

KPM Analytics North America Corporation,

By its attorneys,

*/s/ John T. Gutkoski*

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**LOCAL RULE 7.1 CERTIFICATION**

The undersigned hereby certifies that the parties met and conferred on April 20, 2023 with respect to the relief sought in this Motion. Defendants oppose KPM's Motion *in Limine* in its entirety.

/s/ Kevin R. Mosier  
Kevin R. Mosier

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of April 2023, a true and correct copy of the foregoing document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Paige K. Zacharakis  
Paige K. Zacharakis